

MARCELLUS MCRAE, SBN 140308  
mmcrae@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

ASHLEY E. JOHNSON, admitted *pro hac vice*  
ajohnson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue  
Dallas, TX 75201  
Telephone: 214.698.3100  
Facsimile: 214.571.2949

Attorneys for Defendant AT&T MOBILITY LLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

MICHAEL TERPIN,  
  
Plaintiff,  
  
v.  
  
AT&T MOBILITY LLC; and DOES  
1-25,  
  
Defendants.

CASE NO. 2:18-CV-06975-ODW-KS

[Assigned to the Hon. Otis D. Wright II]

**DECLARATION OF ASHLEY E.  
JOHNSON IN SUPPORT OF JOINT  
DISCOVERY STIPULATION**

[Joint Stipulation Filed Concurrently  
Herewith]

Hearing Date: September 21, 2022  
Time: 10:00 a.m.

Discovery Cutoff: January 30, 2023

Pretrial Conference: April 10, 2023

Trial: May 2, 2023

Judge: Hon. Karen L. Stevenson

**DECLARATION OF ASHLEY E. JOHNSON**

I, Ashley E. Johnson, declare as follows

1. I am an attorney duly licensed and admitted to practice before all courts in the State of Texas and am an attorney in the law firm of Gibson Dunn & Crutcher LLP, attorneys of record for Defendant AT&T Mobility LLC. I am also admitted *pro hac vice* in the above-captioned case. The facts set forth herein are of my own personal knowledge. If called as a witness, I could and would testify to these facts under oath.

2. I make this declaration in support of Defendant's portion of the Joint Discovery Stipulation filed concurrently herewith pursuant to the Local Rule 37-2 of the Court.

3. Attached hereto as Exhibit 1 is an email exchange between Timothy Toohey, counsel for Michael Terpin, and me on May 9-10, 2022.

4. Attached hereto as Exhibit 2 is a privilege log provided by Mr. Terpin, which was attached to Exhibit 1.

5. Attached hereto as Exhibit 3 is an email exchange dated March 27, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu.

6. Attached hereto as Exhibit 4 is an email exchange dated August 15, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu.

7. Attached hereto as Exhibit 5 is an email exchange dated August 21, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 24 day of August 2022 at Dallas, Texas.

GIBSON, DUNN & CRUTCHER LLP

By:   
Ashley E. Johnson

Attorneys for Defendant AT&T MOBILITY  
LLC